SZABO ASSOCIATES INC.



June 25, 2009

Clerk of the Bankruptcy Court United States Bankruptcy Court 701 East Broad Street, Room 400 Richmond, VA 23219

RE: Objections to Claims 37, 11218, and 12016 Circuit City Bankruptcy Case #08-35653

Dear Sir or Madam,

Szabo Associates, Inc. is the agent for WPBF TV, WEND/WRFX-FM, and KPLR TV, unsecured creditors in the Circuit City Bankruptcy Case #08-35653. We have received the objections to the claims filed on behalf of these clients.

For the objection to claim numbers 37 and 267, both for WEND/WRFX-FM, we agree these are duplicates of each other and agree to 37 being removed and 267 remaining. However, there is a typo in the notice for this claim, the call letters should be WEND not WENO.

For claim numbers 11218 (KPLR) and 12016 (WPBF), the objections are based on the claims being untimely filed. According to the service list, notice for KPLR went to 1284 Collection Center Drive in Palm Springs, CA; and notice for WPBF went to P.O. Box 861766 in Orlando, FL. As you will see on the attached invoice pages supplied to the debtor prior to the bankruptcy filing, the correct addresses for the stations are clearly listed. A Palm Springs address is not listed for KPLR at all, and the P.O. Box for WPBF specifies it is a drop box to remit payments and is clearly not the station's main address.

Accordingly, we respectfully request claims 11218 and 12016 be allowed in full as our clients were not given sufficient notice of the bankruptcy or bar date.

Sincerely,

Jennifer Toolan

Szabo Associates, Inc.

JDT/sun encl.

RICHMOND DIVISION

Document

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Alt. Order #



Circuit City Stores inc C/O **Circuit City Stores Inc** Attention: Accounts Payable 9954 Mayland Drive Deep Run 3, 6th Floor Richmond, VA 23233

Send Payment To: **WPBF** PO Box 861766 Orlando, FL 32866

## INVOICE

Invoice #	Invoice Date	Invoice Month	Invoi	ce Period
430124-1	10/19/08	October 2008	09/29	9/08 - 10/17/08
Station IAnn	augt Evacutive	i i i i i i i i i i i i i i i i i i i	Milaa	Calco Dogico

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WPBF	William Wilmot	West Palm Bead	Local
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Advertiser	Product	Estimate Num	<u>ber</u>
Circuit City Stores Inc	PRM Promotional	0619 OCT-C	10/15 ·

Flight Dates

10/15/08 - 10/17/08

Billing Type
Cash
Advertiser Code Product Code
Advertiser Ref

Order #

430124

Spots/

Line	Start Date	End Date	Description	Start/End Time	MTWTFSS	Length	Week	Rate	Туре	
1	10/15/08	10/17/08	M-SUN WPBF New	/s 25 (11-11:35PM	WTF	:30	1	\$450.00	NM	
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2	10/15/08	10/17/08	Wheel Of Fortune	7-7:30PM	WTF	:30	1	\$600.00	NM	
	Weeks:	Start Date 10/13/08	End Date MTWTFS 10/19/08WTF-		<u>Rate</u> \$600.00					
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3	10/15/08	10/17/08	Wknd. Family Plan	ner BB11pm-1135pm	~~WTF~~	:05	1	\$0.00	BB	
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**Total Spots** 

**Gross Total** 

\$1,050.00

Agency Commission

\$157.50

Net Amount Due

\$892.50

**Payment Terms 30 Days** 

REF#: DESC:

CCS PRM 0620

Desc Main

KPLR Inc. 2250 Ball Drive Phone: (314) 447-1111 St. Louis, MO 63146

ATTN: ADVERTISING ACCOUNTING 9954 MAYLAND DR. DEEP RUN 3 100889 CIRCUIT CITY ADV

RICHMOND VA 23233

PROD: CIRCUIT/620 PRM CCS ADV ... CIRCUIT CITY SLSP.: ADAMS, ROSIE

REP...

REMIT TO KPLR INC
BANK OF AMERICA
PO BOX 844836 ORDER TYPE STANDARD INVOICE NO. 81010150 ACCOUNTS PAYABLE DALLAS TX 75284-4836 BILLING INSTRUCTIONS
STANDARD BROADCAST CALENDAR SCHEDULE DATES 10/22/08-10/24/08 DATE 10/26/08 PAGE 1 BROADCAST MONTH OCTOBER KPLR-TV 2322-00195 CONTRACT YEAR

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